

June 14, 2018

VIA ELECTRONIC FILING

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

**EX PARTE FILING OF ENCINA COMMUNICATIONS CORPORATION
REGARDING GN DOCKET NUMBERS 18-122 AND 17-183
EXPANDING FLEXIBLE USE IN MID-BAND SPECTRUM**

Dear Ms. Dortch:

On June 13, 2018, Michael Mulcay met with Umair Javed, advisor to Commissioner Rosenworcel, Will Adams, Wireless Advisor to Commissioner Carr, and Rachel Bender, Wireless Advisor to Chairman Pai.

We discussed modernizing Part 101 of the rules and the associated benefits.

Change: Rule 101.143 -- We recommend that for PtMP networks, the EIRP below the minimum path length specified in Rule 101.143 be changed from a formula to a maximum of 50 dBm.

Benefit: Makes it possible to operate at all distances below the minimum path length.

Change: Rule 101.115(a) – *~~“Unless otherwise authorized upon specific request by the applicant, each~~ Stations authorized under the rules of this part must employ a directional antenna adjusted with the center of the major lobe of radiation in the horizontal plane directed toward the receiving station with which it communicates: provided, however, where a station communicates with more than one point, a multi- or omni-directional antenna ~~may be~~ is authorized ~~if necessary~~. New Periscope antenna systems will not, under ordinary circumstances, be authorized.”*

Benefits: Eliminates unnecessary delay after successful prior coordination, dramatically lowers monthly recurring antenna lease charges, blocks far fewer new applicants.

Change: Rule 101.115(b), add the following footnote:

“Non-compliant antennas (antennas not meeting Category A specifications) are authorized on the condition that they must not cause harmful interference and must accept harmful interference pursuant to Rules 101.103 and 101.115(c). When Rule 101.115(c) requires the licensee of a station using a non-compliant antenna system to upgrade to a higher performance antenna, the licensee must comply with the requirement within thirty (30) days.”

Benefit: Makes it possible to provide licensed carrier-grade broadband services to underserved communities where large antennas are not acceptable.

New Rule: *Unlicensed nomadic or mobile devices can be operated by a PtP licensee from either or both of licensed Stations 1 and 2 provided:*

- i. The unlicensed nomadic and mobile devices are only permitted to transmit after they are connected to a licensed station identifying itself as having the capability of communicating with unlicensed nomadic or mobile devices,*
- ii. The maximum antenna gain of the unlicensed device is limited to 6 dBi,*
- iii. The unlicensed device's EIRP is limited to 36 dBm,*
- iv. The interference from any unlicensed device arriving at a licensed or a new license applicant's station is less than the interference from the licensed Stations 1 or 2,*
- v. The unlicensed devices are secondary and therefore must accept all interference.*

Benefit: Safe operation of nomadic and mobile devices in Part 101 bands without disrupting existing licensees.

Respectfully submitted.

Michael Mulcay, Chairman

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